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*Co-Lead Counsel for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

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This Document Relates to:  
  
ALL ACTIONS  
  
\_\_\_\_\_

**DECLARATION OF LEXI J. HAZAM IN  
SUPPORT OF ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
DEFENDANT SNAP INC.'S MATERIALS  
SHOULD BE SEALED (MASTER  
COMPLAINT)**

I, Lexi Hazam, declare and state as follows:

1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP and Co-Lead Counsel for Plaintiffs in this action. I am a member in good standing of the State Bar of California. I make this declaration based on my own personal knowledge. If called upon to

testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this declaration, as required by Civil Local Rule 7-11, regarding Plaintiffs' Administrative Motion Consider Whether Defendant Snap Inc.'s Materials Should be Sealed.

3. Plaintiffs' Master Complaint contains and refers to materials from Defendant Snap Inc. which Plaintiffs have agreed to treat as highly confidential until a protective order is entered by the Court and Defendant Snap Inc. has formally designated the materials under that protective order. Plaintiffs take no position at this time on whether any of the materials satisfy the requirements for filing under seal.

4. As required by Civil Local Rule 79-5, Plaintiffs are filing redacted version of the Master Complaint on the public docket. Unredacted versions attached to this motion under seal contain highlighting to indicate where redactions are proposed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 14, 2023, in San Francisco, CA.

/s/ Lexi J. Hazam  
Lexi J. Hazam